

Sent by email - Copy Tony Whitty CDC

December 20, 2024

Inspectors: P Lewis BA(Hons) MA MRTPI, J Ayres BA Hons, Solicitor

c/o Programme Officer
Kerry Trueman
Programme Officer Solutions Ltd



Dear Mr Lewis and Ms Ayres

Response to CDC Written Update Note CDC30 and CDC31

You invited participants to the Local Plan submit brief consultation responses to above additional documents.

I represent Landlink Estates Ltd. My representation reference is 8130.

At 1.3 of the CDC30 the Council state that:

"The outcome of the remodelling as set out in the technical note, validates the Council's decision-making in relation to the special strategy and site allocation process pertaining to the submission local plan"

This is not the case, and indeed it is the reverse. The Council have not dealt with coastal inundation scenarios that prevented the Stubcroft Farm appeals being allowed. These appeal decisions have highlighted an issue which prevents development in this coastal zone now and in the future and therefore brings into focus for you, in considering soundness, whether the Local Plan that the Council have submitted is sufficient to deal with climate adaptation in the spatial strategy. If the Inspector at the Stubcroft Farm appeal cannot approve much needed housing at East Wittering now, what has the Council done to deal with the thousands of dwellings which are at risk from the same coastal inundation?

I refer to the paragraph 1.4 of the Council's note CDC30. The Council link the decision at Stubcroft Farm appeals with the strategy they have adopted in the local plan, in particular with regard to decisions at Selsey. It is inappropriate to read directly across from these appeal decisions at east Wittering in relation to the situation at Selsey. The Council appear to make this link with no evidential basis. The Wittering section of the coast is largely a shingle beach, whereas Selsey, is mostly sea wall defence.

At paragraph 25 the Inspector in the Stubcroft Farm case: *"The Council is therefore relying upon the modelling with the defended scenario which it is agreed is the worst case. With sea defences, water overtopping the beach would generally be trapped by the solid defences, not flowing back to sea via the permeable, loose granular material that the beach largely*

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consists of here. Water overtopping a sea defence would generally enter the landward drainage environment where other modelling then demonstrates how surface water will flow.”

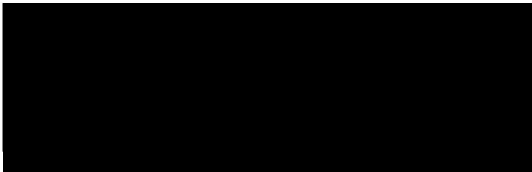
As the Inspector explained the ability to deal with breached sea defences is entirely different. This highlights the fact that the situation in Selsey is potentially more problematic with sea water trapped behind the greater extent of solid defences than at East Wittering.

The Council say at I.4

“Nonetheless, the council will continue to consider how the housing needs of the Manhood Peninsula can be addressed moving forwards, both in the Site Allocation DPD and in the next Local Plan”

This statement is not supported by evidence. The flood risks highlighted by this appeal would suggest an entirely different strategy is required in the Local Plan, and this cannot be remedied by the site allocation DPD as that does not set out the spatial strategy. The Stubbcroft appeal decisions confirm a new approach to inland relocation of the existing settlements on the Manhood Peninsula is necessary now and should have been addressed in the spatial strategy as I have set out in my written and oral evidence.

Yours sincerely



Lisa Jackson MA BSc MRTPI